



January 11, 2019

United States Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Attention: Mr. Wesley Hardegree
Environmental Engineer

Re: **Quarterly Progress Report #25 October-December 2018**
ERP Compliant Coke, LLC
3500 35th Avenue North
Birmingham, Jefferson County, Alabama
USEPA ID No. ALD 000 828 848
Terracon Project No. E1127096

Dear Mr. Hardegree:

On behalf of ERP Compliant Coke, LLC (ERP Coke), Terracon Consultants, Inc. (Terracon) has prepared Quarterly Progress Report #25 for the work completed from October 1, 2018 to December 31, 2018 for the above-referenced site. This progress report has been prepared in accordance with paragraph 53 of the Order on Consent with effective date of August 1, 2016.

PROGRESS REPORT (OCTOBER 1, 2018 THROUGH DECEMBER 31, 2018)

Corrective Measures Implementation

- n Draft Environmental Covenants for SMA 4 and 5 were submitted to EPA on November 12, 2018.
- n LUCP development is underway and once the comments for the Environmental Covenants are received from EPA, the draft LUCP can be completed and submitted to EPA for review.
- n Horizontal well drilling activities began on December 17, 2018.
- n A Draft UIC Permit for SMA 4 was received by ERP Coke on December 26, 2018. The cover letter indicated that the comments on the draft permit were due within 30 days.
- n The response to EPA Comments on Cost Estimates from CMI Work Plan for SMA 4 and SMA 5 were submitted to EPA on October 29, 2018.

Interim Measures

- n Hydraulic Control System was running during this reporting period. The volume of water recovered from October 1, 2018 through December 31, 2018 was 563,720 gallons.
- n Groundwater level measurements and groundwater samples were collected from the monitoring wells in November 2018. These results will be reported to EPA in the next Annual Report which is due by August 30, 2019.

PROJECTED WORK FOR NEXT REPORTING PERIOD (JANUARY 1, 2019 THROUGH MARCH 31, 2019)

Corrective Measures Implementation

We anticipate the following activities related to the approved CMI Work Plan to occur:

- LUCP prepared for SMA 4 and SMA 5.
- Draft Environmental Covenant submitted to ADEM after we receive EPA's comments.
- Completion of horizontal wells for Pilot Test.
- Installation and sampling of vertical soil borings and wells prior to start of Pilot Test

Interim Measures/Remediating Monitoring


- n Collect groundwater samples in February 2018.

CLOSING

If you should have any questions, please do not hesitate to contact us at (205) 942-1289.

Sincerely,

Terracon


Terrell W. Rippstein
Principal Geologist

Cc: Meredith Anderson – EPA Region 4
Mr. Don Wiggins – ERP Coke
ADEM